

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**UNITED STATES OF AMERICA,**

**Case No. 3:24-cv-159**

**Plaintiff,**

**v.**

**KUBOTA NORTH AMERICA  
CORPORATION, a corporation, also d/b/a  
KUBOTA ENGINE CORPORATION,  
KUBOTA TRACTOR CORPORATION,  
KUBOTA MANUFACTURING OF  
AMERICA CORPORATION, KUBOTA  
INDUSTRIAL EQUIPMENT  
CORPORATION, and GREAT PLAINS  
MANUFACTURING  
INCORPORATED/LANDPRIDE,**

**Defendant.**

**COMPLAINT FOR PERMANENT INJUNCTION,  
CIVIL PENALTY JUDGMENT, AND OTHER RELIEF**

Plaintiff, the United States of America, states that other than the parties to this case, it is not currently unaware of any person, organization, or other legal entity with any potential interest in the outcome of this case.

Dated: January 22, 2024

**FOR THE FEDERAL TRADE  
COMMISSION:**

JULIA SOLOMON ENSOR  
Attorney  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
Tel.: 202-326-2377  
Fax: 202-326-3197  
[jensor@ftc.gov](mailto:jensor@ftc.gov)

Respectfully submitted,

**FOR THE UNITED STATES OF  
AMERICA:**

BRIAN M. BOYNTON  
Principal Deputy Assistant Attorney General,  
Civil Division

ARUN G. RAO  
Deputy Assistant Attorney General

AMANDA N. LISKAMM  
Director, Consumer Protection Branch

LISA HSIAO  
Assistant Director  
Consumer Protection Branch

LEIGHA SIMONTON  
United States Attorney

Brian W. Stoltz  
Assistant United States Attorney

/s/ Sean Saper  
SEAN SAPER  
Trial Attorney  
Consumer Protection Branch  
U.S. Department of Justice  
P.O. Box 386  
Washington, DC 20044-0386  
Telephone: 202-742-7116  
Email: [sean.z.saper@usdoj.gov](mailto:sean.z.saper@usdoj.gov)